

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 WAVE 12
<i>Juanita Barton, et al v. Ethicon LLC and Johnson & Johnson</i> Case No. 2:13-cv-20332	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO
EXCLUDE THE OPINIONS AND TESTIMONY OF SCOTT A. GUELCHER, PH.D.**

Plaintiffs, Juanita Barton and James Dean, file this response in opposition out of an abundance of caution. Plaintiffs designated Dr. Guelcher as a general expert in the above-referenced case.

In response to Defendants' notice adopting their prior Motion to Exclude the Opinions and Testimony of Scott A. Guelcher, Ph.D. (Docs 4573, 4574 and 4692). Plaintiffs hereby adopt and incorporate by reference their prior responsive briefing (Doc 2164 and 2937) in opposition to the motion to exclude his testimony. Plaintiffs respectfully request that the Defendants' motion be denied for the reasons stated in the prior briefing.

Dated: November 25, 2019

Respectfully Submitted,

/s/ Charles E. Soechting, Jr.

Charles E. Soechting, Jr.

TX Bar No. 24044333

SIMON GREENSTONE PANATIER LLC

1201 Elm Street, Suite 3400

Dallas, Texas 75270

Telephone: (214) 276-7680

Facsimile: (214) 276-7699

csoechting@sgptrial.com

COUNSEL FOR PLAINTIFFS

CERTIFICATION OF SERVICE

I hereby certify that on November 25, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all CM/ECF participants.

/s/ Charles E. Soechting, Jr.
Charles E. Soechting, Jr.